IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

ANGEL DAVID MORALES VALLELLANES, Plaintiff,

v.

JOHN POTTER, UNITED STATES POSTMASTER GENERAL, ET. ALS., Defendants.

CIVIL NO. 97-2459 (JAG)

DAMAGES BASED ON RETALIATION AND DISCRIMINATION; PROHIBITED PERSONNEL PRACTICES; **UNFAIR LABOR PRACTICES; BREACH OF COLLECTIVE BARGAINING AGREEMENT**

TRIAL BY JURY IS HEREBY **REQUESTED**

NOTICE FOR TAKING DEPOSITIONS

TO THE HONORABLE COURT:

COMES NOW, plaintiff Angel David Morales-Vallellanes through his legal counsel and very respectfully inform this Honorable Court that depositions of the followings defendants witnesses will be taken at our Offices at 22 Mayagüez Street, Hato Rey, Puerto Rico:

- 1. Carmen Rosa: beginning May 4, 2004 from 9:00 a.m. continuing from day to day until its completion
- 2. Frank Girau: May 6, 2004 from 9:00 a.m. continuing from day to day until completion.
- 3. William Morales: May 9, 2004 from 9:00 a.m. to 12:00 p.m.
- 4. Antonio López: May 10, 2004 from 9:00 a.m. to 12:00 p.m.
- 5. José Padró: May 10, 2004 from 2:00 p.m. to 5:00 p.m.
- 6. Rafael Gomila: May 12, 2004 from 9:00 a.m. to 12:00 p.m.
- 7. Virginia Matías: May 14, 2004 from 9:00 a.m. to 5:00 p.m.
- 8. Enrique López: beginning May 18, 2004 from 9:00 a.m. and continuing from day to

- day until its completion
- 9. José Sepúlveda: May 20, 2004 9:00 a.m. to 5:00 p.m.
- 10. Inspector Ron Baraga: June 7, 2004 from 2:00 p.m. to 5:00 p.m.
- 11. Eliezer Baez: June 9, 2004 from 2:00 p.m. to 5:00 p.m.
- 12. Cándido López: June 10, 2004 from 2:00 p.m. to 5:00 p.m.
- 13. John Malavé: beginning June 15, 2004 from 9:00 a.m. and continuing from day to day until its completion
- 14. Pedro Reyes: June 17, 2004 from 9:00 a.m. to 12:00 p.m.
- 15. Juan Rodríguez: June 22, 2004 from 9:00 a.m. to 5:00 p.m.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above and schedule a status conference.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on April 26, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Fidel A. Sevillano-Del Río, Esq., Assistant U.S. Attorney, Federico Degetau Federal Build., 150 Carlos Chardón Av., Hato Rey, Puerto Rico 00918.

> S/MIGUEL E. MIRANDA-GUTIERREZ MIGUEL E. MIRANDA-GUTIERREZ, ESO. ATTORNEY FOR PLAINTIFF PMB 132, 500 Muñoz Rivera Local 15, San Juan, Puerto Rico 00918-3349

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